

BellSouth Telecommunications, Inc.

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February 18, 2000

Guy M. Hicks 1 1 57
General Counsel

VIA HAND DELIVERY

David Waddell, Executive Secretary Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37238

Re:

Application of Memphis Networx, LLC for a Certificate of Public Convenience and Necessity to Provide Intrastate Telecommunication Services and Joint Petition of Memphis Light, Gas & Water Division, a Division of the City of Memphis, Tennessee and A&L Networks-Tennessee for Approval of Agreement Between MLGW and A&L regarding Joint Ownership of Memphis Networx, LLC Docket No. 99-00909

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of the proposed Statement of Issues submitted by BellSouth Telecommunications, Inc. at the pre-hearing conference yesterday. Copies of the enclosed have been provided to counsel of record for all parties.

Very truly yours,

GuyM. Hicks

GMH:ch Enclosure



BEFORE THE TENNESSEE REGULATORY AUTHORITY Nashville, Tennessee

IN RE:

Application of Memphis Networx, LLC for a Certificate of Public Convenience and Necessity to Provide Intrastate Telecommunication Services and Joint Petition of Memphis Light, Gas & Water Division, a Division of the City of Memphis, Tennessee and A&L Networks-Tennessee for Approval of Agreement Between MLGW and A&L regarding Joint Ownership of Memphis Networx, LLC

Docket No. 99-00909

STATEMENT OF ISSUES ON BEHALF OF BELLSOUTH TELECOMMUNICATIONS, INC.

Pursuant to the "Notice of Pre-Hearing Conference" dated February 8, 2000, BellSouth Telecommunications, Inc. ("BellSouth") respectfully submits the following statement of the issues in the case:

- 1. Is Memphis Networx, LLC ("Memphis Networx") in compliance with the provisions of Part 4 of Chapter 52 of Title 7 of the Tennessee Code Annotated?
- 2. Is Memphis Networx in compliance with the provisions of Part 2 of Chapter 4 of Title 65 of the Tennessee Code Annotated?

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.

By:

Guy M. Hicks Patrick W. Turner

333 Commerce Street, Suite 2101 Nashville, Tennessee 37201-3300

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CERTIFICATE OF SERVICE

I hereby certify that on February 17, 2000, a copy of the foregoing document was served on the parties of record, via the method indicated: Mand Richard Collier, Esquire [] Mail Tennessee Regulatory Authority [] Facsimile 460 James Robertson Parkway Overnight Nashville, TN 37243-0500 √l Hand D. Billye Sanders, Esquire [] Mail Waller, Lansden, Dortch & Davis [] Facsimile 511 Union St., #2100 [] Overnight Nashville, TN 37219-1750 [Hand John Knox Walkup, Esquire [] Mail Wyatt, Tarrant & Combs [] Facsimile 511 Union Street, Suite 1500 [] Overnight Nashville, TN 37219-1750 [] Hand Ward Huddleston Mail Memphis Networx [] Facsimile 7555 Appling Center Drive [] Overnight Memphis, TN 38133-5069 [] Hand J. Maxwell Williams, Esquire [Mail MLG&W [] Facsimile 220 South Main Street [] Overnight Memphis, TN 38103 [Hand Henry Walker, Esquire [] Mail Boult, Cummings, et al. [] Facsimile 414 Union Ave., #1600 [] Overnight P. O. Box 198062 Nashville, TN 39219-8062 Hand Charles B. Welch, Esquire [] Mail Farris, Mathews, et al. [] Facsimile 205 Capitol Blvd, #303 [] Overnight Nashville, TN 37219